

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

In re:)	Case No. 24-80617
)	(Chapter 11)
C M HEAVY MACHINERY, LLC)	
)	
Debtor.)	
_____)	

**DECLARATION IN SUPPORT OF APPLICATION TO APPROVE EMPLOYMENT OF
MAURICE B. VERSTANDIG, ESQ. AND THE VERSTANDIG LAW FIRM, LLC AS
GENERAL REORGANIZATION COUNSEL TO ABOVE-CAPTIONED DEBTOR**

1. My name is Maurice VerStandig, I am over the age of eighteen, and I am competent to testify to the matters set forth herein.

2. I am an attorney licensed to practice before the highest courts of the District of Columbia, the State of Nevada, the State of Maryland, the Commonwealth of Virginia, and the State of Florida; as well as before the United States District and Bankruptcy Courts for the Eastern District of Oklahoma, the District of North Dakota, the District of Columbia, the District of Maryland, the Eastern District of Virginia, the Western District of Virginia, the Northern District of Florida, the Middle District of Florida, the Southern District of Florida, the District of Nevada, the Western District of Wisconsin, the District of Colorado, the District of Nebraska, the Southern District of Illinois, the Central District of Illinois, and the Eastern District of Missouri; as well as before the Supreme Court of the United States; as well as before the United States Courts of Appeal for the District of Columbia Circuit, the Fourth Circuit, the Ninth Circuit, and the Eleventh Circuit; as well as before the United States Tax Court.

3. I reside in the State of Maine but primarily work in the District of Columbia, Maryland, and North Dakota, maintaining mailing addresses in all three jurisdictions. I do not maintain an office in the State of Oklahoma, am not licensed to practice in the state courts of

Oklahoma, and do not regularly represent clients in Oklahoma, though I am admitted to the bar of this Honorable Court.

4. I am the sole member of The VerStandig Law Firm, LLC, a Maryland limited liability company, which houses the majority of my legal practice. The VerStandig Law Firm, LLC uses a registered trade name—The Belmont Firm—for purposes of handling debtor-side work in the Washington, DC metropolitan area. I am also the sole member of The Dakota Bankruptcy Firm, a North Dakota limited liability company established for purposes of maintaining a mailing address in North Dakota and housing my bankruptcy practice in North Dakota.

5. I am a graduate of the University of Wisconsin-Madison (BA with honors, 2006) and the University of Miami School of Law (JD *cum laude*, 2009).

6. The majority of my legal practice is dedicated to the representation of parties in bankruptcy proceedings and related adversary cases, including (i) the representation of debtors in Chapter 11 cases; (ii) the representation of asset-based lenders in their capacity as creditors in Chapter 11 cases; (iii) the representation of consumers in Chapter 7 and Chapter 13 cases; and (iv) the periodic representation of trustees. As noted *supra*, the majority of my cases are in the United States Bankruptcy Court for the District of Columbia, the United States Bankruptcy Court for the District of North Dakota, and the United States Bankruptcy Court for the District of Maryland, though I also regularly appear in other bankruptcy courts throughout the country.

7. I serve as a coordinating editor of the American Bankruptcy Institute Journal, have served on the Local Rules committee of the United States Bankruptcy Court for the District of Columbia since 2020, co-host an American Bar Association podcast on Subchapter V bankruptcy cases, and regularly publish articles on developments in bankruptcy law.

8. I represent no other entity in connection with this case and am disinterested as that term is defined in 11 U.S.C. §101(14). I (i) am not a creditor, an equity security holder, or an insider of the Debtor; (ii) am not and was not, within two years before the date of filing of the petition for relief, a director, officer or employee of the Debtor; and (iii) do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason. Further, I hold no interest adverse to the interest of the Debtor.

9. I represent Christopher Wayne Glenn (“Mr. Glenn”) in connection with his Chapter 11 case in the United States Bankruptcy Court for the District of North Dakota. *See In re Glenn*, Case No. 23-30132 (Bankr. D.N.D. 2023). That case was filed in April 2023. CMHM filed a proof of claim in that case to which I, on behalf of Mr. Glenn, filed an objection on July 7, 2023. The objection was sustained on August 10, 2024 and, thereafter, a plan of reorganization was confirmed on August 30, 2023. The order sustaining the objection to the claim of CMHM is a final order for which the applicable appellate period has long since lapsed, with no appeal being taken. The bankruptcy remains an open case, post-confirmation, with a motion to amend the plan of reorganization currently pending (albeit one seeking to amend solely for purposes of replacing the disbursing agent). CMHM is aware that I was the entity’s opposing counsel in Mr. Glenn’s case and, upon analysis of applicable ethical rules, I do not believe my representation of Mr. Glenn serves as a conflict barring my representation of CMHM because my representation of Mr. Glenn, as it relates to the now-disallowed claim of CMHM, concluded nearly a year ago.

10. Excepting my representation herein, my furnishing the Debtor with bankruptcy-centric pre-filing legal advice, and the aforementioned historical representation of a party adverse to the Debtor, I have no connection with the Debtor, the Debtor’s creditors, any other party in

interest, their respective attorneys, the United States Trustee, or any person employed in the office of the United States Trustee.

11. All facts contained in the application to which this declaration is affixed are true and correct to the best of my knowledge.

I, Maurice VerStandig, pursuant to Section 1746 of Title 29 of the United States Code, do hereby declare, under the penalty of perjury, that I have personal knowledge of the matters set forth herein and the foregoing are true and correct.

Dated: August 8, 2024

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
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